

Timothy M. Stubson, Wyo. Bar. No. 6-3144
 Holly Tysse Wyo. Bar. No. 7-5553
 Brandon E. Pryde Wyo. Bar. No. 8-6883
 Crowley Fleck, PLLP
 111 West 2nd Street, Suite 220
 Casper, WY 82601
 (P) 307-265-2279
 tstubson@crowleyfleck.com
 htysse@crowleyfleck.com
 bpryde@crowleyfleck.com

and

Eugene M. LaFlamme (*admitted pro hac vice*)
 Jared B. Giroux (*admitted pro hac vice*)
 Jillian L. Lukens (*admitted pro hac vice*)
 McCoy Leavitt Laskey LLC
 N19 W24200 Riverwood Drive, #125
 Waukesha, WI 53188
 (P) 262-522-7000
 elaflamme@MLLlaw.com
 jgiroux@MLLlaw.com
 jlukens@MLLlaw.com

*Attorneys for Defendants,
 Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)
 Individually and as Parent and Legal Guardian)
 of W.W., K.W., G.W., and L.W., minor children)
 and MATTHEW WADSWORTH,)
)
 Plaintiffs,)
)
 v.)
)
 WALMART INC. and)
 JETSON ELECTRIC BIKES, LLC,)
)
 Defendants.)

Case No. 2:23-cv-00118-NDF

**DECLARATION OF
 JARED B. GIROUX IN
 SUPPORT OF REPLY TO
 MOTION TO EXCLUDE
 TESTIMONY OF DEREK
 KING**

I, Jared B. Giroux, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.
3. Attached as Exhibit 1 are the pertinent portions of Defendant's battery expert Samuel Sudler's deposition taken on November 22, 2024.
4. Attached as Exhibit 2 is a true and correct copy of Green River Sheriff Department's Detective Sergeant Jeff Sheaman's report dated February 1, 2022.
5. Attached as Exhibit 3 are the pertinent portions of Green River Fire Department Assistant Fire Chief Bill Robinson's deposition taken on November 15, 2023.
6. Attached as Exhibit 4 are the pertinent portions of Plaintiffs' fire cause expert Derek King's deposition taken on August 19, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 23, 2024



Jared B. Giroux